

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**VIASAT, INC.,**

**Plaintiff,**

**vs.**

**KIOXIA CORPORATION and KIOXIA  
AMERICA, INC.,**

**Defendants.**

**Case No. 6:21-cv-1231**

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants Kioxia Corporation and Kioxia America, Inc., ("Defendants") respectfully move for an order extending the time for Defendants to respond to Plaintiff Viasat, Inc.'s ("Viasat") complaint until April 1, 2022. No party to this litigation opposes this motion.

Defendants have consented to service of the complaint via email and have agreed to waive any objections to the absence of a summons. In return for that consent and agreement, the parties have agreed to an extension of time to respond to the complaint until April 1, 2022.

The parties believe that this will allow this case to proceed more efficiently than it otherwise would. Accordingly, Defendants move for an order extending the time to respond to the complaint to April 1, 2022.

Dated: December 8, 2021

Respectfully submitted,

/s/ Robinson Vu

Robinson Vu

Texas State Bar No: 24047046

Telephone: (713) 229-1715

Facsimile: (713) 229-7815

Email: [Robinson.Vu@bakerbotts.com](mailto:Robinson.Vu@bakerbotts.com)

Michael Hawes

Texas State Bar No: 24010761

Telephone: (713) 229-1750

Facsimile: (713) 229-7750

Email: [michael.hawes@bakerbotts.com](mailto:michael.hawes@bakerbotts.com)

Michael Silliman

Texas State Bar No: 24093152

Telephone: (713) 229-1464

Facsimile: (713) 229-6164

Email: [michael.silliman@bakerbotts.com](mailto:michael.silliman@bakerbotts.com)

Spencer Packard

Texas State Bar No: 24125823

Telephone: (713) 229-1888

Facsimile: (713) 229-7788

Email: [spencer.packard@bakerbotts.com](mailto:spencer.packard@bakerbotts.com)

**Baker Botts L.L.P.**

910 Louisiana Street

Houston, Texas 77002

**Attorneys for Defendants**

**Kioxia Corporation and Kioxia America, Inc.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on December 8, 2021 a true and correct copy of the above document was been served on all counsel of record via the Court's ECF system. All other parties were served by electronic mail or First Class Mail.

/s/ Robinson Vu

Robinson Vu